



VIA EMAIL [Chad.Stobbe@dnr.iowa.gov](mailto:Chad.Stobbe@dnr.iowa.gov)

*Hormel Foods Corporate Services, LLC  
1 Hormel Place  
Austin MN 55912-3680*

August 8, 2008

Chad A. Stobbe  
Land Quality Bureau  
Iowa Department of Natural Resources  
502 East 9<sup>th</sup> Street  
Wallace State Office Building  
Des Moines, Iowa 50319-0034

RE: Proposed Amendments to Iowa Administrative Code (IAC) 567 Chapter 108

Dear Mr. Stobbe:

Thank you for the opportunity to submit comments regarding the proposed amendments to Iowa Administrative Code 567 Chapter 108. In response, Hormel Foods Corporation, on behalf itself and its subsidiaries, submits the following.

#### **Introduction**

Hormel Foods is a multinational manufacturer and marketer of consumer-branded food and meat products, many of which are among the best known and trusted in the food industry. Hormel Foods is based just north of the Iowa border in Austin, Minnesota. We also have a strong presence in Iowa, with seven facilities employing almost 1,600 workers. In addition, we have just broken ground for a new \$90 million facility in Dubuque that will employ another 180 workers.

Hormel's flagship plant in Austin, Minnesota creates about 50 million pounds annually of industrial byproduct (IBP). This IBP is made up primarily of organic materials and contains manure, flushings, byproduct from meat processing activities, and added lime. For the past 8 years, approximately 12 million tons of this IBP are land applied annually on 20 Iowa farms pursuant to IAC 567 Chapter 121.<sup>1</sup>

Nutrient values of this IBP are estimated to contain 3.1% nitrogen and 1.2% phosphorus (2.75% phosphate). Under normal land application procedures, this translates to 143 pounds of nitrogen and 55 pounds of phosphate, the value of which has been calculated

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<sup>1</sup> We have also contemplated land application of IBP produced by Hormel's new facility in Dubuque. It is anticipated that 2.4 M tons of IBP will be produced by that plant at the beginning and expect that to grow to almost 7 M tons.

## Conclusion

We strongly encourage the Department to reconsider any changes to IAC 567 Ch. 108 that will deter the beneficial use of IBP. The rules should retain a provision by which certain qualifying solid wastes, including IBP, can continue to be land applied. The provision should further allow storage and application of the materials in a manner that—as now—protects the environment, encourages their beneficial use, allows them to continue to be provided to farmers free of charge, and discourages their disposal in landfills. Failure to do so will either divert these valuable nutrients away from Iowa or burden its environment by increasing the demand on landfill space.

Continuing to allow the recycling of the nutrients in IBP will provide valuable assistance to farmers who choose to take advantage of it and further the Department's stated goal to "encourage[] the beneficial use of solid by-products in order to preserve resources, conserve energy, and reduce or eliminate the need to dispose to solid by-products in sanitary landfills."<sup>10</sup> Thank you again for the opportunity to comment on the proposed amendments. Please do not hesitate to contact me if you have questions.

Sincerely,



Dennis Boik,  
Director, Environmental Sustainability  
Hormel Foods Corporation

cc: Bill Northey	Secretary of Agriculture, Iowa Department of Agriculture and Land Stewardship
Richard Leopold	Director, Iowa Department of Natural Resources
Terry Jensen	Bureau Chief, Feed & Fertilizer, Iowa Department of Agriculture and Land Stewardship
- Joe Swedberg	Vice President of Legislative Affairs, Hormel Foods Corporation
Larry Pfeil	Vice President of Engineering, Hormel Foods Corporation
Mark Coffey	Plant Manager, Austin Plant, Hormel Foods Corporation
- Lori Marco	Senior Attorney, Hormel Foods Corporation
Lee Johnson	Manager of Plant Engineering, Austin Plant, Hormel Foods Corporation
- Rich Johnson	Senior Staff Engineer, Environmental Compliance Coordinator, Hormel Foods Corporation

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<sup>10</sup> Proposed IAC 567 Ch. 108.1



## Stobbe, Chad [DNR]

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**From:** rrjohnson@hormel.com  
**Sent:** Friday, August 08, 2008 1:09 PM  
**To:** Stobbe, Chad [DNR]; Leopold, Richard [DNR]; Bill.Northey@iowaagriculture.gov; Jensen, Terry [IDALS]; jcswedberg@hormel.com; ljpfel@hormel.com; dlboik@hormel.com; macoffey@hormel.com; LJMarco@Hormel.com; ldjohnson@hormel.com; rrjohnson@hormel.com  
**Subject:** Proposed Amendments to IAC 567 Chapter 108  
**Importance:** High  
**Attachments:** Comment IAC 567-108.PDF



Comment IAC  
67-108.PDF (154 K.

Mr. Chad, Stobbe,

In response to your July 23, 2008 letter, please find our comments in the attachment below to the proposed amendments potentially affecting IAC 567 Chapter 108, titled "Beneficial Use Determinations: Solid By-Products As Resources And Alternative Cover Material".

(See attached file: Comment IAC 567-108.PDF)

Sincerely,

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Environmental Compliance Coordinator  
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P Please help conserve the environment.

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